

6. Annexed hereto as Exhibit “D” is a true and accurate copy of the transcript of the November 8, 2018 Plea Allocution and Disposition (Sexual Abuse and Forcible Touching counts).

7. Annexed hereto as Exhibit “E” is a true and accurate copy of the transcript of the November 8, 2018 Plea Allocution and Disposition (Perjury count).

8. Annexed hereto as Exhibit “F” is a true and accurate copy of the New York State Board of Professional Medical Conduct’s January 17, 2019 License Surrender Order.

9. Upon the exhibits annexed hereto and the accompanying Memorandum of Law, it is respectfully requested that this Court enter an Order dismissing Plaintiff’s Complaint pursuant to Rule 12(b)(6), as the Complaint fails to state a cause of action upon which relief can be granted.

I declare under penalty of perjury, pursuant to 28 U.S.C. §1746, that the foregoing is true and correct. Executed on June 12, 2020 in the County and State of New York.

Dated: New York, New York
June 12, 2020

/s/ A. Michael Furman
A. Michael Furman, Esq.